

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

PATRICK McGOVERN-ALLEN


SUPERSEDING INDICTMENT

Counts

18 U.S.C. § 2261A(1) (stalking - 2 counts)

18 U.S.C. § 844(h) (use of fire in commission of a federal felony - 1 count)

18 U.S.C. § 2 (aiding and abetting)


Foreman

Filed in open court this 27th day,
Of October A.D. 20 22

Clerk

Bail, \$ _____

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>22-cr-288</u>
v.	:	DATE FILED: _____
PATRICK McGOVERN-ALLEN	:	VIOLATION:
	:	18 U.S.C. § 2261A(1) (stalking - 2 counts)
	:	18 U.S.C. § 844(h) (use of fire in
	:	commission of a federal felony - 1
	:	count)
		18 U.S.C. § 2 (aiding and abetting)

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about December 18, 2021, in the Eastern District of Pennsylvania and elsewhere, defendant

PATRICK McGOVERN-ALLEN

traveled in interstate commerce from the State of New Jersey to Abington Township in the Commonwealth of Pennsylvania, with the intent to harass and intimidate another person, A.R., a juvenile, a person known to the grand jury, and in the course of and as a result of such travel caused substantial emotional distress to A.R. and placed a member of A.R.'s immediate family in reasonable fear of death or serious bodily injury, and the defendant used a dangerous weapon during the offense.

In violation of Title 18, United States Code, Sections 2261A(1), 2261(b), and 2261B.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 18, 2021, in the Eastern District of Pennsylvania and elsewhere, defendant

PATRICK McGOVERN-ALLEN

knowingly used fire, and aided and abetted the use of fire, to commit stalking, in violation of Title 18, United States Code, Sections 2261A(1), 2261(b) and 2261B, a felony prosecutable in a court of the United States.

In violation of Title 18, United States Code, Sections 844(h)(1) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 2, 2022, in the Eastern District of Pennsylvania and elsewhere, defendant

PATRICK McGOVERN-ALLEN

traveled in interstate commerce from the State of New Jersey to Westtown East Goshen Township in the Commonwealth of Pennsylvania, with the intent to harass and intimidate another person, K.M., a person known to the grand jury, and in the course of and as a result of such travel placed K.M. in reasonable fear of death or serious bodily injury, and the defendant used a dangerous weapon during the offense.

In violation of Title 18, United States Code, Sections 2261A(1), and 2261(b).

A TRUE BILL:

[REDACTED]



JACQUELINE C. ROMERO
United States Attorney